

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
MAJED KHALIL,

)  
)  
Plaintiff, )  
)

v. )  
)

FOX CORPORATION, FOX NEWS  
NETWORK LLC, LOU DOBBS, and  
SIDNEY POWELL,

)  
)  
)  
)  
Defendants. )  
-----X

Case No. 21-cv-10248-LLS

**STIPULATION AND [PROPOSED]  
ORDER**

WHEREAS, on December 1, 2021, Plaintiff Majed Khalil filed his Complaint against Defendants in New York Supreme Court, New York County.

WHEREAS, on December 2, 2021, Defendants Fox News Network LLC and Fox Corporation removed this action to this Court.

WHEREAS, on January 17, 2022, Defendant Sidney Powell (“Powell”) filed a Motion to Dismiss (the “Powell Motion to Dismiss”). *See* Dkt. 23, 28-31 (as corrected).

WHEREAS, the Court approved a briefing schedule by which Plaintiff’s time to respond to the Powell Motion to Dismiss was set to and including February 28, 2022. *See* Dkt. 10.

WHEREAS, on January 31, 2022, Defendants Fox Corporation, Fox News Network LLC, and Lou Dobbs (“Fox Defendants”) filed a Motion to Dismiss (the “Fox Defendants’ Motion to Dismiss”). *See* Dkt. 25-27.

WHEREAS, the Court granted an extension by Stipulation between Plaintiff and Powell by which Plaintiff’s time to respond to the Powell Motion to Dismiss was extended to and including March 15, 2022, in an effort to put the briefing on the Powell Motion to Dismiss on the same Schedule as the later-filed Fox Defendants’ Motion to Dismiss. *See* Dkt. 33.

WHEREAS, Plaintiff has requested a three-day extension to finalize Plaintiff's opposition to the Powell Motion to Dismiss, and Powell has agreed to that request; Plaintiff has made a similar request of the Fox Defendants, and they also have agreed to the request with respect to the Fox Defendants' Motion to Dismiss.

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned counsel, as follows:

1. Plaintiff shall file his opposition to the Powell Motion to Dismiss on or before March 18, 2022.
2. Powell's reply, if any, shall be filed on or before April 19, 2022.

Dated: New York, New York  
March 11, 2022

/s/ Sigmund S. Wissner-Gross

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SO ORDERED:

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Louis L. Stanton, USDJ